

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

NORMA R. VALDEZ

V.

JOHN SCOTT CHORBA and  
C.R. ENGLAND, INC.

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CIVIL ACTION NO. 7:15-CV-00306

**DEFENDANTS, JOHN SCOTT CHORBA and C.R. ENGLAND, INC.'S**  
**NOTICE OF REMOVAL**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS:

Pursuant to 28 U.S.C. §§ 1332 and 1441(a), Defendants, **JOHN SCOTT CHORBA and C.R. ENGLAND, INC.**, hereby removes this action to the United States District Court for the Southern District of Texas from the 229th Judicial District Court of Starr County, Texas, stating as follows:

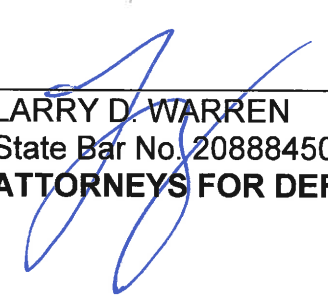
1. Plaintiff, Norma R. Valdez, commenced this action in the 229th Judicial District Court of Starr County, Texas, where it was given Cause No. DC-15-326. This action is between citizens of different states. Plaintiff is a resident of Texas. Defendant C.R. England is a Utah Corporation and John Scott Chorba is a resident of Indiana. Further, Plaintiff claims damages for serious personal injury and is seeking damages of \$1,000,000. Accordingly, this Court has original jurisdiction under 28 U.S.C. § 1332.
2. Defendant, John Scott Chorba received the summons and complaint on June 8, 2015, so this removal is timely under 28 U.S.C. § 1446(b).
3. A copy of all process, pleadings, and orders served upon Defendant is attached as Exhibit A.

4. Defendant has provided written notice of this Notice of Removal to all adverse parties and has filed a copy with the Clerk of the 229th Judicial District Court of Starr County, Texas.

5. Defendants C.R. England and John Scott Chorba consents to the removal.

Dated: July 8, 2015

Respectfully submitted,

  
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LARRY D. WARREN  
State Bar No. 20888450  
**ATTORNEYS FOR DEFENDANTS**

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I hereby certify that on the **8th** day of **July 2015**, the foregoing was filed with the Clerk of Court using the CM/ECF system, and was served on counsel:

**E-Filing Notification System:**

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**ATTORNEYS FOR PLAINTIFF**

  
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LARRY D. WARREN